



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: EPR-N

JAN 23 2009

Sarah Bucklin
Project Manager
Bureau of Land Management
Casper Field Office
2987 Prospector Drive
Casper, WY 82604

Re: Final Environmental Impact Statement
for West Antelope II Coal Lease Application
[CEQ# 20080515]

Dear Ms. Bucklin:

The U.S. Environmental Protection Agency (EPA) has reviewed the Bureau of Land Management's (BLM) Final Environmental Impact Statement (FEIS) for West Antelope II Coal Lease Application to assess the consequences of issuing a lease for a 4109-acre tract of federally owned solid minerals making available 430 million tons of surface-minable coal in the Powder River Basin (PRB) of Wyoming. We appreciate the time and effort BLM has taken to understand and respond to our comments. In most cases, the FEIS has incorporated updated information EPA provided on the Natural Events Action Plan and in Tables 3-3, 3-4, and 3-5.

Air quality continues to be EPA's main concern for the energy production areas in the Powder River Basin (PRB). Large surface coal mines have the potential to become particulate emission sources in the PRB contributing to air quality degradation. Although Wyoming Department of Environmental Quality (WDEQ) has, by statute, the authority and responsibility to require mitigation for air quality impacts. EPA continues to believe that BLM has a duty to mitigate the impacts for the connected action of mining coal as a result of holding the lease sale.

Air quality models were used to predict whether there would be additional increases in PM₁₀ emissions from this mining area, possibly causing exceedances of the air quality standards, when annual production is increased from 36 to 42 million tons per year. We appreciate your response to this concern by publishing a summary of the air quality modeling performed for the permit application as Attachment A in Appendix F. The summary does not provide a definition for several technical acronyms, i.e. 'LNCM', which would have helped your readers understand the details of this method for assessing

cumulative air quality impacts.

We appreciate your interest in our comments. If you have any further questions, please contact James Hanley of my staff at (303) 312-6725.

Sincerely,

A handwritten signature in dark ink, appearing to read "Larry Svoboda", written over a horizontal line.

Larry Svoboda
Director, NEPA Program